

THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

ONE SOUTH STATION

**Boston, MA 02110  
(617) 305-3500**

**MITT ROMNEY**  
GOVERNOR

**KERRY HEALEY**  
LIEUTENANT GOVERNOR

**BETH LINDSTROM**  
DIRECTOR  
OFFICE OF CONSUMER AFFAIRS  
AND BUSINESS REGULATION

**PAUL G. AFONSO**  
CHAIRMAN

**JAMES CONNELLY, ESQ.**  
COMMISSIONER

**W. ROBERT KEATING**  
COMMISSIONER

**EUGENE J. SULLIVAN, JR.**  
COMMISSIONER

**DEIRDRE K. MANNING**  
COMMISSIONER

**BY E-MAIL AND U.S. MAIL**

April 27, 2004

David S. Rosenzweig, Esq.  
Keegan, Werlin & Pabian, LLP  
265 Franklin Street, Sixth Floor  
Boston, MA 02110

**RE: NSTAR Electric, D.T.E. 03-121**

Dear Mr. Rosenzweig:

Enclosed please find the Department's seventh set of information requests in the above-captioned matter. Responses should be filed on or before May 3, 2004. If you have any questions, please feel free to contact me at (617) 305-3630.

Sincerely,

/s/

William H. Stevens, Jr.  
Hearing Officer

cc: Mary Cottrell  
William Stevens, Jr.  
Staff as assigned  
Service List

Enclosures

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

SEVENTH SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
NSTAR ELECTRIC, D.T.E. 03-121

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company the following information requests with respect to the above captioned matter.

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company in this proceeding.

1. "NSTAR Electric" or "Companies" means Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company, their officers, directors, employees, consultants, and attorneys.
2. "Companies' Filing" or "Filing" means all the documents NSTAR Electric filed in this proceeding.
3. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
4. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
5. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
6. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
7. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche,

- computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
8. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
  9. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) John Cope-Flanagan, Legal Division; (3) Jeff Hall, Rates and Revenue Requirements Division; (4) Claude Francisco, Rates and Revenue Requirements Division; (5) Sean Hanley, Rates and Revenue Requirements Division; (6) Xuan Yu, Rates and Revenue Requirements Division; (7) Joseph Passsaggio, Rates and Revenue Requirements Division; and (8) Meera Bhalotra, Rates and Revenue Requirements Division.

- DTE-NSTAR-7-01 When each of the NSTAR Electric companies developed its current distribution rates for each rate class, did provisions of the Restructuring Act, such as the rate cap provisions, the requirement for a non-bypassable transition charge, as well as any other provisions, prevent the rates for each rate class to be set at equalized rates of return? Please describe how the current distribution rates were developed for each of the NSTAR Electric companies.
- DTE-NSTAR-7-02 Mr. LaMontagne states that one of the goals of the Company's proposed standby rates is to ensure that prospective standby customers receive accurate price signals so that they can properly decide whether to install distributed generation. If the proposed standby rates are approved and a customer installs distributed generation under those rates, what level of confidence can that customer have that its standby and distribution rates will not change significantly at the time of the Company's next base rate case, affecting the economics of the customer's initial decision to install distributed generation.
- DTE-NSTAR-7-03 In reference to Exhibit NSTAR-HCL-9, at 1, please define "High Tension" and explain why no high tension investment data was provided for Commonwealth Electric Company.
- DTE-NSTAR-7-04 In reference to Exhibit NSTAR-HCL-9, at 2-4, please provide the worksheets that support the way each of the NSTAR electric companies derived the revised standby rates. Please also provide this information in electronic format.
- DTE-NSTAR-7-05 In reference to Exhibit NSTAR-HCL-10, M.D.T.E. No. 138, please explain why the 20 percent threshold limit does not apply to installed generation units with a combined nameplate rating level greater than 500KW? How was the 500 KW limit derived?
- DTE-NSTAR-7-06 Please refer to Exhibit NSTAR-HCL-9, at 2-4. For each of the NSTAR electric companies, please provide all reasons why the Company proposes to provide a discounted rate compared with the rates in the original filing.
- DTE-NSTAR-7-07 Refer to Exhibit NSTAR-HCL-7, at 25, lines 15-21. Please explain the reasons why NSTAR Electric has modified the initially proposed "grandfather" provision from those customers who began satisfying all, or a portion of, their internal load requirements from their own

generation facilities before the “filing date” to before the “effective date” of the proposed tariffs.

- DTE-NSTAR-7-08 In reference to Exhibit at 14, lines 7-8, please provide a formulaic definition of “average demand” and define “customer’s usage.”
- DTE-NSTAR-7-09 In reference to Exhibit NSTAR- HCL-8 of LaMontagne’s Rebuttal, please define “MaxBQ” and “AvgBQ.”
- DTE-NSTAR-7-10 Please reconcile the apparent inconsistency between the use of “Average/Max billing demand ratio” in Exhibit NSTAR-HCL-7, at 14-15 compared with the “MaxBQ/AvgBQ” ratios shown in Exhibit NSTAR-HCL-8.
- DTE-NSTAR-7-11 Please provide in an electronic readable medium (Microsoft Excel) the data and calculations used to developed the frequency histograms shown in Exhibit NSTAR-HCL-8.
- DTE-NSTAR-7-12 In reference to Exhibit NSTAR-HCL-7, at 15, lines 14-15, please elaborate on and provide any study or data in support of the assertion that “[u]nder this structure, the contract demand will not exceed the lowest monthly billing demand.”
- DTE-NSTAR-7-13 Please provide for each of the NSTAR Electric companies a schedule similar to Exhibit NSTAR-HCL-9, at 1 using the distribution investments during the test years for the existing base rates.
- DTE-NSTAR-7-14 In reference to Exhibit NSTAR-HCL-7, at 16 and Exhibit NSTAR-CPS 1, at 4, please provide a copy of any distribution planning manuals, used by each of the NSTAR Electric companies, that specify that distribution planning relies on non-coincident load.
- DTE-NSTAR-7-15 In reference to Exhibit NSTAR-CPS-1, at 4-6, please provide by geographic location the number of distribution substations (23/13.8/13.2 kV) and the number of circuits under each distribution sub-station for each of the NSTAR Electric companies. Identify the DG facilities connected to these distribution circuits.